

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

BRIDGET SIMPSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

WALGREEN CO.; SUMTER EASY HOME
LLC; and NINGBO (USA) HOMELINK
ECO-ITECH CO., LTD.,

Defendants.

Case No. 1:23-cv-16465

Honorable Franklin U. Valderrama

PARTIES' STIPULATION AND JOINT MOTION FOR SCHEDULING ORDER

Plaintiff Bridget Simpson ("Plaintiff") and Walgreen Co., Sumter Easy Home LLC, and Ningbo (USA) Home-Link Plastic Product Mfg., (collectively, "Defendants") (together, the "Parties"), stipulate to and jointly request that the Court enter an order to adopt the following briefing schedule for Defendants' Motion to Dismiss Plaintiff's Class Action Complaint (Doc. 15) and Defendants' Motion to Strike Nationwide Class Allegations (Doc. 16) (together, "Defendants' Responsive Motions"). As good cause in support thereof, The Parties state as follows:

1. Plaintiff filed the Complaint in this action on December 9, 2022. (Doc. 1)
2. On December 29, 2023, upon consideration of Defendants' unopposed Motion for Extension of Time to File Responsive Pleading, this Court ruled that all answers or other responsive pleadings are due by 2/20/2024 (Doc. 12).
3. Filed concurrent with the present motion are Defendants' Responsive Motions.
4. The Parties have discussed and agreed to the proposed briefing schedule to afford sufficient time to address the issues raised in Defendants' responsive pleading and

to accommodate the prepaid, nonrefundable vacation schedules of counsel, with Plaintiff's response to be due on or before March 19, 2024, and Defendants' reply due by April 9, 2024.

5. This Order will not affect the current joint initial status report deadline of 2/27/2024.

THEREFORE, the Parties stipulate and agree, based on good cause, that:

1. Plaintiff's response to Defendants' Responsive Motions shall be filed on or before March 19, 2024;
2. Defendants' optional reply brief(s) shall be due on or before April 9, 2024; and;
3. The Parties respectfully request an Order adopting the briefing schedule as outlined above.

Date: February 20, 2024

Respectfully submitted,

Faruqi & Faruqi, LLP

By: /s/ Timothy J. Peter

Timothy J. Peter (Bar No. 306965)

tpeter@faruqilaw.com

1617 JFK Boulevard, Suite 1550

Philadelphia, Pennsylvania 19103

Telephone: (267) 536-2145

Facsimile: (215) 277-5771

*Counsel for Plaintiff
and the Proposed Classes*

Roeser Tanner & Graham LLC

/s/ Peter S. Roeser

Peter S. Roeser

ARDC 6257273

Matthew D. Tanner

ARDC 6202508

2 North Riverside Plaza, suite 1850

Chicago IL 60606

Telephone: (312) 621-0303

Email: proeser@rtglaw.com

Email: mtanner@rtglaw.com

Conner & Winters LLP

Todd P. Lewis (*pro hac vice forthcoming*)

Arkansas. Bar No. 96226

Jorge J. Rodriguez (*pro hac vice forthcoming*)

Arkansas Bar No. 2020175

4375 N. Vantage Dr., Ste. 405

Fayetteville, AR 72703

Telephone: (479) 582-5711

Email: tlewis@cwlaw.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 20th day of February 2024, upon electronically filing the foregoing document, a copy of same was served on all counsel of record via the court's ECF system. Additionally, a copy was emailed to all counsel not yet registered with the court's ECF system.

By: /s/ Timothy J. Peter
Timothy J. Peter